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8 *Attorneys for the State Defendants*

9 **UNITED STATES DISTRICT COURT**

10 **DISTRICT OF NEVADA**

11 DANIEL VARGAS, individually,

CASE NO. 2:14-cv-1942-JCM-CWH

12 Plaintiffs,

13 vs.

14 AMBER HOWELL, Administrator of the  
Nevada Division of Child and Family  
15 Services in her individual capacity; STEVE  
MCBRIDE, Deputy Administrator of  
Nevada Youth Training Center in his  
16 individual capacity; RICHARD  
GLOECKNER, Superintendent, Nevada  
17 Youth Training Center in his individual  
capacity; ROBERT K. STOKES, Elko  
18 County Manager in his individual capacity;  
ELKO COUNTY; JAMES GOODSON,  
19 Head Group Supervisor, in his individual  
capacity; RUSSELL TAYLOR, Assistant  
20 Head Group Supervisor, in his individual  
capacity; GARY PATTERSON, Group  
21 Supervisor, in his individual capacity;  
SHAUN BRILEY, Group Supervisor, in his  
22 individual capacity; JOHN OLSON, Group  
Supervisor, in his individual capacity;  
23 DEBORAH KNOTTS, Correctional Nurse,  
in her individual capacity; DOE OFFICERS  
24 I-X, DOE HEALTH CARE PROVIDERS IX,  
DOES I-X, inclusive, DOES XI-XX,  
25 Inclusive, ROEs I-X,

**STIPULATION AND ORDER TO  
STAY THE RENEWED MOTION FOR  
ATTORNEYS' FEES AND BRIEFING  
PENDING SETTLEMENT  
APPROVAL**

26 Defendants.

27 IT IS HEREBY STIPULATED AND AGREED, by and between Defendants Amber  
28 Howell, Steve McBride, Richard Gloeckner, James Goodson, Russell Taylor, Shaun Briley,

1 John Olson and Deborah Knotts (collectively, the "State Defendants"), and Plaintiff Daniel  
2 Vargas, by and through their respective counsel:

3 That the parties have a conditional settlement pending approval of the Board of  
4 Examiners, which will be set on August 11, 2020. Because Nevada law requires approval  
5 by the Board of Examiners of this conditional settlement, the parties stipulate and agree  
6 that all briefing on the Renewed Motion for Attorneys' Fees will be stayed pending  
7 approval. Additionally, the parties anticipate they will file a Stipulated Dismissal and  
8 Withdrawal of the Renewed Motion for Attorney's Fees, no later than August 25, 2020,  
9 which is two weeks post Board of Examiners meeting.

10 Respectfully submitted this 15th day of June, 2020.

11 AARON D. FORD  
12 Attorney General

CHRISTIANSEN LAW OFFICES

13 By: /s/ Steve Shevorski  
14 Steve Shevorski (Bar No. 8256)  
15 Chief Litigation Counsel  
16 *Attorneys for State Defendants*

By: /s/ Kendelee L. Works  
Peter S. Christiansen (Bar No. 5254)  
Kendelee L. Works (Bar No. 9611)  
Keely A. Perdue (Bar No. 13931)  
17 *Attorneys for Plaintiff*

18 **IT IS SO ORDERED.**

19 DATED June 19, 2020.

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21   
22 UNITED STATES DISTRICT JUDGE  
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